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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

In re Application of:

Gary Cole

Serial No. 10/006,089

Filed: December 6, 2001

For: System and Method for Managing Information Objects

§ Group Art Unit: 2192
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§ Examiner: Yigdall, Michael J.
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§ Atty. Dkt. No.: 5681-96802
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CERTIFICATE OF MAILING
37 C.F.R. § 1.8

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Name of Registered Representative

November 21, 2005
Date

Signature

APPEAL BRIEF

Mail Stop Appeal Brief - Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Sir/Madam:

Further to the Notice of Appeal filed September 9, 2005, Appellant presents this Appeal Brief. Appellant respectfully requests that the Board of Patent Appeals and Interferences consider this appeal.

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I. REAL PARTY IN INTEREST

The real party in interest is Sun Microsystems, Inc., a corporation organized and existing under and by virtue of the laws of the State of Delaware, and having its principal place of business at 4150 Network Circle, Santa Clara, CA 95054.

II. RELATED APPEALS AND INTERFERENCES

No other appeals, interferences or judicial proceedings are known which would be related to, directly affect or be directly affected by or have a bearing on the Board's decision in this appeal.

III. STATUS OF CLAIMS

Claims 1-4, 6-12 and 14-33 stand finally rejected. The rejection of claims 1-4, 6-12 and 14-33 is being appealed. A copy of claims 1-4, 6-12 and 14-33 is included in the Claims Appendix herein below.

IV. STATUS OF AMENDMENTS

No amendments to the claims have been submitted subsequent to the final rejection. Please note that the Advisory Action of October 13, 2005 erroneously indicates that proposed amendments will be entered; however, no amendments were proposed subsequent the final rejection.

V. SUMMARY OF CLAIMED SUBJECT MATTER

Independent claim 1 is directed to a system for managing information including a software program stored on a computer-readable medium operable to maintain an identity index that includes a virtual identity. The virtual identity recited in claim 1 includes a plurality of information object identifiers each corresponding to a respective information object. For example, in some embodiments, the software program may be operable to associate one or more uses with information objects that define the user. Thus, the

software program may maintain a "virtual identity" for each user where the virtual identity includes a list of information objects associated with the user. *See, e.g.*, FIG 1-4 and paragraphs 12, 24, 27-29, 31, 33, 38 and 43.

An identity index may store information mapping information objects describing a particular user to that user. An identity index may include a number of virtual identities. According to one embodiment, an administrative system may include a management system that maintains an identity index associating users with information objects and resources. An information object may be a collection of individual pieces of data that represent a single entity or identity, such as a user. For example, a single user may have different accounts on different types of systems and an identity index may maintain information regarding those accounts and associate the information objects (i.e. account information) with a single logical name that represents the virtual identity of the user. Alternatively, in another embodiment, an identity index may associate routing tables on various servers with a particular network element. Thus, the identity index may maintain and associate disparate information regarding a single entity or identity. An identity index may be maintained using any of various data storage schemes, such as sequential files, indexed files, LDAP directories, or relational databases. In various embodiments, a virtual identity may be maintained for human users, a programmatic entity or a computer system that uses resources. *See, e.g.*, FIG 1-4; paragraphs 12, 24, 27, 28, 30, 32, 33-36, 38, 44 and 48-50.

The virtual identity also includes, for each information object, a resource name identifying a resource at which the respective information object is located, where the resource name is associated with the respective information object identifier. The virtual identity also include a resource definition corresponding to each respective named resource, where the resource definition also includes connection information. The resource may be a system or an application accessible via a network that defines information objects. For example, a Unix system, a Windows system, or a database system may each be a resource that defines accounts as information objects. A resource may include a particular computer system, either distributed or not, an application on a

computer system, or an application distributed across multiple computer systems, according to different embodiments. Each resource may define information objects related to the management or configuration of an associated resource. Resource accounts, or information objects, may represent each resource's view of the associated identity. In other words, each resource definition may represent the user within the scope of the resource. *See, e.g.*, FIG 1-4; paragraphs 12-14, 27, 29, 34, 37, 39, 40, 44 and 47-50.

For example, one embodiment of an identity index is illustrated in Appellant's FIG. 3. The identity index includes a virtual identity (e.g., 312). The virtual identity includes multiple of information object identifiers (e.g., 350) each corresponding to a respective information object (e.g., 342, 344 and 346). The virtual identity also includes, for each information object, a resource name (e.g., Reso01, Reso02 (353) and Reso03) identifying a resource (210, 212 and 214) at which the respective information object is located, wherein the resource name is associated with the respective information object identifier (e.g., JANE_D, janed (352) or JaneD). The identity index further includes and resource definitions (e.g., 360, 362 and 364), each of which includes connection information (e.g., 368). Thus, as illustrated by FIG. 3, a single virtual identity may include information objects that represent the virtual identity, such as on different resources or systems.

Independent claim 20 is directed to a system for managing information similar to that recited in claim 1, discussed above. Similarly to the system recited by claim 1, the system recited in claim 20 includes a software program stored on a computer readable medium operable to maintain an identity index. The identity index of claim 20 includes multiple virtual identities and each virtual identity corresponds to a user. Additionally, each virtual identity of claim 20 includes a plurality of information object identifiers, each corresponding to a respective information object. As with claim 1, discussed above, each virtual identity also includes multiple of resource names, each associated with an information object identifier and corresponding to a resource at which the information object corresponding to the associated information object identifier is located and may also include multiple resource definitions including a resource definition for each named

resource, where each resource definition includes connection information for the corresponding named resource. Please refer to the description of claim 1, above, for a more detailed discussion regarding identity indexes, virtual identities, information objects and resources.

Independent claim 26 is directed to a method for managing information that includes storing an identity index including multiple information object identifiers corresponding to a set of information objects that define a user. The method of claim 26 also includes associating a resource definition with each information object identifier, where each resource definition corresponds to a different one of multiple resources at which the information object corresponding to the associated information object identifier is located and where each resource definition contains connection information for the corresponding resource. Please refer to the description of claim 1, above, for a more detailed discussion regarding identity indexes, virtual identities, information objects and resources.

VI. GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

1. Claims 1-4, 6-12 and 14-33 stand finally rejected under 35 U.S.C. § 102(e) as being anticipated by Gwertzman et al. (U.S. Patent 6,189,000) (hereinafter "Gwertzman").

VII. ARGUMENT

Claims 1-2, 4, 6-12 and 14-33 stand finally rejected under 35 U.S.C. § 102(e) as being anticipated by Gwertzman et al. (U.S. Patent 6,189,000) (hereinafter "Gwertzman"). Appellants traverse this rejection for at least the following reasons. Different groups of claims are addressed under their respective subheadings.

Claims 1-2, 4, 6, 8 -10, 12, 14-18 and 19:

Regarding claim 1, contrary to the Examiner's assertion, Gwertzman does not disclose an identity index that comprises a virtual identity that in turn comprises a plurality of information object identifiers each corresponding to a respective information object, and for each information object, a resource name identifying a resource at which the respective information object is located, wherein the resource name is associated with the respective information object identifier; and wherein the identity index further comprises a resource definition corresponding to each respective named resource, wherein the resource definition further comprises connection information.

As noted in the Summary above, Appellant's claimed invention pertains to a particular type of data structure, an identity index, for use in managing user information objects. One embodiment of an identity index is illustrated in Appellant's FIG. 3. The identity index includes a virtual identity (e.g., 312). The virtual identity includes a plurality of information object identifiers (e.g., 350) each corresponding to a respective information object (e.g., 342, 344 and 346). The virtual identity also includes, for each information object, a resource name (e.g., Reso01, Reso02 (353) and Reso03) identifying a resource (210, 212 and 214) at which the respective information object is located, wherein the resource name is associated with the respective information object identifier (e.g., JANE_D, janed (352) or JaneD). The identity index further includes and resource definitions (e.g., 360, 362 and 364), each of which includes connection information (e.g., 368).

Gwertzman does not teach a data structure for an identity index as recited in Appellant's claims. In contrast, Gwertzman teaches "a storage-mechanism interface." In Gwertzman, "instead of having to indicate a path to the storage mechanism and the actual name of the data structure, the application developer needs only to call the data structure a logical name (e.g., 'foo') and the storage-mechanism interface takes care of properly locating and identifying the storage mechanism and the data structure (i.e., providing the actual name of the data structure)" (Gwertzman -- col. 6, lines 59-65).

Gwertzman's storage-mechanism interface is a programmatic interface called by application developer code. An application developer using Gwertzman invention uses the logical name for a data structure and Gwertzman's storage-mechanism interface uses the logical name as an index to look up the full path name in a database.

As noted above, Appellants' claim 1 recites an identity index in which a virtual identity is associated with multiple information objects and resources. Gwertzman does not teach the particular data structure of an identity index that comprises a virtual identity that includes a plurality of information object identifiers. In contrast, each of the entries in Gwertzman's database, which the Examiner equates to virtual identities, contains information regarding only a *single* logical name mapped to a *single* path name. Moreover, as noted above, Gwertzman system allows a developer to use a logical name rather than a full path or pathname to a data structure. Gwertzman's system does not include a data structure with multiple information objects associated with a logical name. Since, Gwertzman teaches that his system is intended to allow a developer to use a logical name instead of a full pathname to a data structure, it would not make since for Gwertzman's system to include multiple information objects and multiple resource locations for a logic name.

The Examiner cites column 8, lines 28-30 and argues that Gwertzman's database entries may contain a plurality of information object identifiers. However, the cited passage is describing using the DepObject and DepProp fields of the configuration information in TABLE 1. Specifically, Gwertzman teaches that DepObject and DepProp fields may be used to "instantiate a second object using information obtained from a first, already instantiated object". Here Gwertzman is not describing anything about the entries in his database, which the Examiner equates to an identity index. Instead, Gwertzman is discussing a way to duplicate an already instantiated programming object, especially for use with grouping properties by cross-linking between two storage mechanisms (Gwertzman, column 8, lines 28-42). No mention is made, either at the Examiner's cited passages or elsewhere, regarding a virtual identity that comprises *a plurality* of information object identifiers *each* corresponding to a respective information

object, and for each information object, a resource name identifying a resource at which the respective information object is located, wherein the resource name is associated with the respective information object identifier; and wherein the identity index further comprises a resource definition corresponding to each respective named resource, wherein the resource definition further comprises connection information.

In response to Appellant's arguments above, the Examiner argues, in the Response to Arguments section of the Final Action, that Gwertzman's database corresponds to the identity index in Appellant's claim because the database comprises logical names or virtual identities that in turn comprise the actual names of data structures. The Examiner is clearly incorrect. Gwertzman teaches that an entry in his database "includes a field indicating the path name to the storage mechanism associated with the logical name and the actual name of the data structure containing the desired property." Gwertzman's database entry also includes "a field containing a user identity for that storage mechanism or containing a property" (Gwertzman, column 7, lines 1-8). Thus, each entry in Gwertzman's database only includes a logical name, a path name (to the storage mechanism), the actual name of the data structure, and a user identity.

In the Advisory Action, the Examiner refers to the DepObject and DepProp fields of Gwertzman. However, as shown above, Gwertzman teaches that DepObject and DepProp fields may be used to instantiate different programming objects that each refer to the same stored attribute. For instance, Gwertzman describes grouping users that all use the same background color by instantiating multiple objects (e.g. objects representing the user's background color preference) from an already instantiate object (Gwertzman, column 8, lines 28-42). Furthermore, Gwertzman's TABLE 1, cited by the Examiner, only includes a single instance of a DepObject and DepProp fields, not multiple instances, as suggested by the Examiner. Gwertzman's DepObject and DepProp fields clearly do not represent a plurality of information object identifiers, as erroneously asserted by the Examiner.

Anticipation requires the presence in a single prior art reference disclosure of each and every element of the claimed invention, arranged as in the claim. M.P.E.P 2131; *Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co.*, 221 USPQ 481, 485 (Fed. Cir. 1984). The identical invention must be shown in as complete detail as is contained in the claims. *Richardson v. Suzuki Motor Co.*, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). As Gwertzman does not disclose the particular structure of the identity index of Appellant's claimed invention, Gwertzman clearly does not anticipate Appellant's claims.

Therefore, for at lease the reasons above, the rejection of claim 1 is clearly not supported by the cited art and removal thereof is respectfully requested. Similar remarks to those above regarding claim 1 also apply to independent claims 20 and 26, as they include similar limitations to those of claim 1.

Claim 3:

Regarding claim 3, Gwertzman fails to disclose that the schema map maps a resource attribute from the resource to a virtual attribute defined by the schema map. In contrast, Gwertzman teaches the use of a schema that identifies the properties included within a user object on a server (Gwertzman, column 7, lines 51-65). For example, as Gwertzman describes, if an object includes phone numbers of users, the schema for that object may include an element stating: "phone numbers". Thus, rather than teaching a schema map that maps a resource attribute from a resource to a virtual attribute defined by the schema map, Gwertzman teaches a schema that describes what elements or properties are included in a user object. The Examiner cites column 9, lines 28-44 of Gwertzman. However, this portion of Gwertzman is not describing Gwertzman's schema. Instead, the cited passage is describing a Get Object function that "is used by an application to obtain an ADS object containing a user property." The cited passage does not even mention any sort of schema or schema map. Nor does it describe mapping a resource attribute to a virtual attributed *defined by a schema map.*

In response to the above arguments, the Examiner, in the Advisory Action, contends that Gwertzman's schema "defines elements that identify the properties included in each information object" and that an element in Gwertzman's schema is a virtual property or virtual attribute. However, as noted above Gwertzman clearly teaches that the elements of his schema indicate to an application developer that such information is available to access. Gwertzman does not teach a schema map that maps a resource attribute from the resource to a virtual resource attribute defined by the schema map. Instead, as shown above, Gwertzman's schema merely lists the properties of an object that are available for access.

Thus, the rejection of claim 3 is not supported by the prior art and removal thereof is respectfully requested.

Claim 7:

Regarding claim 7, Gwertzman fails to disclose the virtual identity corresponds to a user. The Examiner cites column 7, lines 14-17 of Gwertzman. However, the cited passage refers to user identification for a storage mechanism containing a property associated with a logical name. Specifically, Gwertzman teaches that a logical name is typically associated with a data structure containing a desired property and that uniquely identifies that data structure (column 6, lines 52-55). Gwertzman also teaches that the database entry associated with the logical name may include user identification information for accessing the storage mechanism that stored the data structure. Thus, the user identification information referred to by the Examiner at column 7, lines 14-17 is describing user identification required to access a storage mechanism associated with a logical name (e.g. virtual identity) and does not describe a logical name or virtual identity that corresponds to a user.

Gwertzman further teaches that such user information is stored in the BindAsName and BindAsPassword entries of TABLE 1. Gwertzman specifically states, [t]he BindAsName and BindAsPassword field[s] are used to tell the storage-mechanism interface the user credentials and passwords that are authentic for a particular storage

mechanism" and that "[w]ithout proper authentication, the requesting application cannot access the storage mechanism containing the desired user property" (column 8, lines 42-48). Thus, Gwertzman describes using user credentials to access storage mechanism storing desired properties (properties associated with a logical name) not that a logical name corresponds to a user.

Claim 11:

Regarding claim 11, Gwertzman fails to disclose that the schema map maps a resource attribute from the resource to a virtual attribute defined by the schema map. In contrast, Gwertzman teaches the use of a schema that identifies the properties included within a user object on a server (Gwertzman, column 7, lines 51-65). For example, as Gwertzman describes, if an object includes phone numbers of users, the schema for that object may include an element stating: "phone numbers". Thus, rather than teaching a schema map that maps a resource attribute from a resource to a virtual attribute defined by the schema map, Gwertzman teaches a schema that describes what elements or properties are included in a user object. The Examiner cites column 9, lines 28-44 of Gwertzman. However, this portion of Gwertzman is not describing Gwertzman's schema. Instead, the cited passage is describing a Get Object function that "is used by an application to obtain an ADS object containing a user property." The cited passage does not even mention any sort of schema or schema map. Nor does it describe mapping a resource attribute to a virtual attributed *defined by a schema map*. Please refer to the arguments above regarding claim 3 for a more detailed discussion regarding Gwertzman's failure to disclose a schema map that maps a resource attribute from the resource to a virtual resource attribute defined by the schema map.

Claims 20-24:

Regarding claim 20, Gwertzman does not disclose an identity index that comprises a plurality of virtual identities each corresponding to a user, where each virtual identity includes a plurality of information object identifiers each corresponding to a respective information object, and for each information object, a resource name

identifying a resource at which the respective information object is located, wherein the resource name is associated with the respective information object identifier; and wherein the identity index further comprises a resource definition corresponding to each respective named resource, wherein the resource definition further comprises connection information, as asserted by the Examiner.

Gwertzman does not teach a data structure for an identity index as recited in Appellant's claims. In contrast, Gwertzman teaches "a storage-mechanism interface." In Gwertzman, "instead of having to indicate a path to the storage mechanism and the actual name of the data structure, the application developer needs only to call the data structure a logical name (e.g., 'foo') and the storage-mechanism interface takes care of properly locating and identifying the storage mechanism and the data structure (i.e., providing the actual name of the data structure)." Gwertzman -- col. 6, lines 59-65. Gwertzman's storage-mechanism interface is a programmatic interface called by application developer code. An application developer using Gwertzman invention would only have to use the logical name for a data structure and Gwertzman's storage-mechanism interface uses the logical name as an index to look up the full path name in a database.

Gwertzman does not teach virtual identities that correspond to users. Instead, Gwertzman teaches that a logical name, which the Examiner equates to a virtual identity, is associated with a data structure containing a desired property (column 6, lines 50-58). Gwertzman does not teach using virtual identities that correspond to users. Gwertzman teaches that a logical name is typically associated with a data structure containing a desired property and that uniquely identifies that data structure (column 6, lines 52-55). Gwertzman also teaches that the database entry associated with the logical name may include user identification information for accessing the storage mechanism that stored the data structure. Thus, the user identification information referred to by the Examiner at column 7, lines 14-17 is describing user identification required to access a storage mechanism associated with a logical name (e.g. virtual identity) and does not describe a logical name or virtual identity that corresponds to a user.

Gwertzman further teaches that such user information is stored in the BindAsName and BindAsPassword entries of TABLE 1. Gwertzman specifically states, [t]he BindAsName and BindAsPassword field[s] are used to tell the storage-mechanism interface the user credentials and passwords that are authentic for a particular storage mechanism" and that "[w]ithout proper authentication, the requesting application cannot access the storage mechanism containing the desired user property" (column 8, lines 42-48). Thus, Gwertzman describes using user credentials to access storage mechanism storing desired properties (properties associated with a logical name) not that a logical name corresponds to a user.

Gwertzman also does not teach the particular data structure of an identity index that comprises a plurality of virtual identities that in turn comprises a plurality of information object identifiers each corresponding to a respective information object, and for each information object, a resource name identifying a resource at which the respective information object is located, wherein the resource name is associated with the respective information object identifier; and wherein the identity index further comprises a resource definition corresponding to each respective named resource, wherein the resource definition further comprises connection information.

Additionally, each of the entries in Gwertzman's database, which the Examiner equates to virtual identities, contains information regarding only a *single* logical name mapped to a *single* path name. The Examiner cites column 8, lines 28-30 and argues that Gwertzman's database entries may contain a plurality of information object identifiers. However, the cited passage is describing using the DepObject and DepProp fields of the configuration information in TABLE 1. Specifically, Gwertzman teaches that DepObject and DepProp fields may be used to "instantiate a second object using information obtained from a first, already instantiated object". Gwertzman is not describing anything about the entries in his database, which the Examiner equates to an identity index. Instead, Gwertzman is discussing a way to duplicate an already instantiated programming object, especially for use with grouping properties by cross-linking between two storage mechanisms (Gwertzman, column 8, lines 28-42). No mention is made, either at the

Examiner's cited passages or elsewhere, regarding a virtual identity that comprises *a plurality* of information object identifiers each corresponding to a respective information object.

Furthermore, Gwertzman's database entries do not contain *resource definitions*. The Examiner cites column 8, lines 3-25 of Gwertzman and argues that TABLE 1 of Gwertzman includes connection information. However, TABLE 1 of Gwertzman illustrates information used to initialize an ObjectInfo object used as part of creating Gwertzman's storage-mechanism interface as a COM object. Gwertzman's TABLE 1 is not a part of Gwertzman's database. Nowhere does Gwertzman describe TABLE 1 as being part of, of as describing, the database, which the Examiner equates to an identity index. Instead, Gwertzman states that TABLE 1 defines configuration information utilized to initialize the storage-mechanism COM object (Gwertzman, column 7, line 67 – column 8, line 20). Since Gwertzman does not include connection information in resource definitions in the entries of his database, Gwertzman cannot be said to anticipate Appellant's claim 20.

Please also refer to the arguments above regarding claim 1 as they also apply to claim 20.

Anticipation requires the presence in a single prior art reference disclosure of each and every element of the claimed invention, arranged as in the claim. M.P.E.P 2131; *Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co.*, 221 USPQ 481, 485 (Fed. Cir. 1984). The identical invention must be shown in as complete detail as is contained in the claims. *Richardson v. Suzuki Motor Co.*, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). As Gwertzman does not disclose the particular structure of the identity index of Appellant's claimed invention, Gwertzman clearly does not anticipate Appellant's claims.

Therefore, for at lease the reasons above, the rejection of claim 20 is clearly not supported by the cited art and removal thereof is respectfully requested.

Claim 25:

Regarding claim 25, Gwertzman fails to disclose that the schema map maps a resource attribute from the resource to a virtual attribute defined by the schema map. In contrast, Gwertzman teaches the use of a schema that identifies the properties included within a user object on a server (Gwertzman, column 7, lines 51-65). For example, as Gwertzman describes, if an object includes phone numbers of users, the schema for that object may include an element stating: "phone numbers". Thus, rather than teaching a schema map that maps a resource attribute from a resource to a virtual attribute defined by the schema map, Gwertzman teaches a schema that describes what elements or properties are included in a user object. The Examiner cites column 9, lines 28-44 of Gwertzman. However, this portion of Gwertzman is not describing Gwertzman's schema. Instead, the cited passage is describing a Get Object function that "is used by an application to obtain an ADS object containing a user property." The cited passage does not even mention any sort of schema or schema map. Nor does it describe mapping a resource attribute to a virtual attributed *defined by a schema map*. Please refer to the arguments above regarding claims 3 and 11 for a more detailed discussion regarding Gwertzman's failure to disclose a schema map that maps a resource attribute from the resource to a virtual resource attribute defined by the schema map.

Claims 26-31 and 33:

Gwertzman does not disclose storing an identity index including a plurality of information object identifiers corresponding to a set of information objects that define a user, contrary to the Examiner's assertion. The Examiner cites column 7, lines 1-8 and lines 44-50. However, the cited passages only describe using user identification or credentials to access a data structure including a desired property. Gwertzman's logical names correspond to the desired property. The cited passage does not describe a plurality of information object identifiers corresponding to a set of information objects that define a user. Specifically, Gwertzman teaches that a logical name is typically associated with a data structure containing a desired property and that uniquely identifies that data structure

(column 6, lines 52-55). Gwertzman also teaches that the database entry associated with the logical name may include user identification information for accessing the storage mechanism that stored the data structure. Thus, the user identification information referred to by the Examiner at column 7, lines 14-17 is describing user identification required to access a storage mechanism associated with a logical name (e.g. virtual identity) and does not describe a logical name or virtual identity that corresponds to a user.

Gwertzman further teaches that such user information is stored in the BindAsName and BindAsPassword entries of TABLE 1. Gwertzman specifically states, [t]he BindAsName and BindAsPassword field[s] are used to tell the storage-mechanism interface the user credentials and passwords that are authentic for a particular storage mechanism" and that "[w]ithout proper authentication, the requesting application cannot access the storage mechanism containing the desired user property" (column 8, lines 42-48). Thus, Gwertzman describes using user credentials to access storage mechanism storing desired properties (properties associated with a logical name) not that a logical name corresponds to a user.

Gwertzman also fails to disclose associating a resource definition with each information object identifier, wherein each resource definition corresponds to a different one of a *plurality of resources* at which the information object corresponding to the associated information object identifier is located, and wherein each resource definition contains connection information for the corresponding resource. Gwertzman teaches that an entry in his database "includes a field indicating the path name to the storage mechanism associated with the logical name and the actual name of the data structure containing the desired property." Gwertzman's database entry also includes "a field containing a user identity for that storage mechanism or containing a property" (Gwertzman, column 7, lines 1-8). Thus, each entry in Gwertzman's database includes a logical name, a path name (to the storage mechanism), the actual name of the data structure, and a user identity. Thus, each of the entries in Gwertzman's database, which

the Examiner equates to virtual identities, contains information regarding only a *single* logical name mapped to a *single* path name.

The Examiner cites column 8, lines 3-25 and argues that Gwertzman's database entries may contain a plurality of information object identifiers. However, the cited passage is describing using the DepObject and DepProp fields of the configuration information in TABLE 1. Specifically, Gwertzman teaches that DepObjects and DepProp fields may be used to "instantiate a second object using information obtained from a first, already instantiated object". Gwertzman is not describing anything about the entries in his database, which the Examiner equates to an identity index. Instead, Gwertzman is discussing a way to duplicate an already instantiated programming object, especially for use with grouping properties by cross-linking between two storage mechanisms (Gwertzman, column 8, lines 28-42). No mention is made, either at the Examiner's cited passages or elsewhere, regarding a virtual identity that comprises *a plurality* of resources at which an information object is located.

Therefore, for at lease the reasons above, the rejection of claim 26 is clearly not supported by the cited art and removal thereof is respectfully requested.

Claim 32:

Regarding claim 32, Gwertzman fails to disclose that the schema map maps a resource attribute from the resource to a virtual attribute. In contrast, Gwertzman teaches the use of a schema that identifies the properties included within a user object on a server (Gwertzman, column 7, lines 51-65). For example, as Gwertzman describes, if an object includes phone numbers of users, the schema for that object may include an element stating: "phone numbers". Thus, rather than teaching a schema map that maps a resource attribute from a resource to a virtual attribute, Gwertzman teaches a schema that describes what elements or properties are included in a user object. The Examiner cites column 9, lines 28-44 of Gwertzman. However, this portion of Gwertzman is not describing Gwertzman's schema. Instead, the cited passage is describing a Get Object

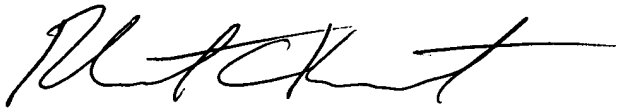
function that "is used by an application to obtain an ADS object containing a user property." The cited passage does not even mention any sort of schema or schema map. Please refer to the arguments above regarding claims 3 and 11 for a more detailed discussion regarding Gwertzman's failure to disclose a schema map that maps a resource attribute from the resource to a virtual resource attribute.

VIII. CONCLUSION

For the foregoing reasons, it is submitted that the Examiner's rejection of claims 1-4, 6-12 and 14-33 was erroneous, and reversal of his decision is respectfully requested.

The Commissioner is authorized to charge the appeal brief fee of $500.00 and any other fees that may be due to Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. Deposit Account No. 501505/5681-96802/RCK. This Appeal Brief is submitted with a return receipt postcard.

Respectfully submitted,



Robert C. Kowert
Reg. No. 39,255
Attorney for Appellants

Meyertons, Hood, Kivlin, Kowert & Goetzel, P.C.
P.O. Box 398
Austin, TX 78767-0398
(512) 853-8850

Date: November 21, 2005

IX. CLAIMS APPENDIX

The claims on appeal are as follows.

1. A system for managing information comprising:

a software program stored on a computer-readable medium operable to maintain an identity index, wherein said identity index comprises:

a virtual identity further comprising:

a plurality of information object identifiers each corresponding to a respective information object; and

for each information object, a resource name identifying a resource at which said respective information object is located, wherein said resource name is associated with said respective information object identifier; and

a resource definition corresponding to each respective said named resource, wherein the resource definition further comprises connection information.

2. The system of claim 1, wherein said resource definition further comprises a schema map.

3. The system of claim 2, wherein said schema map maps a resource attribute from said resource to a virtual attribute defined by said schema map.

4. The system of claim 3, wherein a virtual attribute value for said virtual attribute is stored in RAM.

6. The system of claim 1, wherein said set of connection information contains a connection parameter selected from one of a hostname, a port, a resource username, a resource password or a resource type.

7. The system of claim 1, wherein said virtual identity corresponds to a user.

8. The system of claim 1, wherein said information object comprises a user account.

9. The system of claim 8, wherein said information object identifier comprises an account name.

10. The system of claim 8, wherein said resource definition further comprises a schema map.

11. The system of claim 10, wherein said schema map maps a resource attribute from said resource to a virtual attribute defined by said schema map.

12. The system of claim 11, wherein a virtual attribute value for said virtual attribute is maintained in RAM.

14. The system of claim 8, wherein said set of connection information contains a connection parameter selected from one of a hostname, a port, a resource username, a resource password or a resource type.

15. The system of claim 8, wherein said resource is one of a Unix system, a Windows NT system, a Oracle database system or an email server.

16. The system of claim 1, wherein said software program is operable to connect to said resource based on said resource definition.

17. The system of claim 1, wherein said resource definition further comprises a schema map; and

wherein, said software program is operable to create a composite view of said virtual identity based on said schema map.

18. The system of claim 17, wherein said software program is operable to present a representation of said composite view in a graphical user interface.

19. The system of claim 18, wherein said graphical user interface is customizable.

20. A system for managing information comprising:

a software program stored on a computer-readable medium operable to maintain an identity index, wherein said identity index comprises:

a plurality of virtual identities, wherein each virtual identity corresponds to a user, and wherein each virtual identity further comprises:

a plurality of information object identifiers, wherein each information object identifier corresponds to a respective information object; and

a plurality of resource names, wherein each resource name is associated with an information object identifier and each resource name corresponds to a resource at which the information object corresponding to the associated information object identifier is located; and

a plurality of resource definitions comprising a resource definition for each named resource, wherein each resource definition comprises connection information for the corresponding named resource.

21. The system of claim 20, wherein each resource definition further comprises a schema map.

22. The system of claim 20, wherein each information object comprises a user account.

23. The system of claim 22, wherein each information object identifier comprises and account name.

24. The system of claim 23, wherein each resource definition further comprises a schema map.

25. The method of claim 24, wherein each said schema map maps a resource attribute to a virtual attribute.

26. A method of managing information comprising:

storing an identity index comprising a plurality of information object identifiers corresponding to a set of information objects that define a user;

associating a resource definition with each information object identifier, wherein each resource definition corresponds to a different one of a plurality of resources at which the information object corresponding to the associated information object identifier is located, and wherein each resource definition contains connection information for the corresponding resource.

27. The method of claim 26, wherein each information object identifier from said set of information object identifiers comprises a native key for the corresponding information object.

28. The method of claim 27, wherein said native key comprises an account name.

29. The method of claim 26, wherein the step of associating at least one of a set of resource definitions with each information object identifier further comprises associating at least one resource name with each information object identifier.

30. The method of claim 26, wherein each information object comprises a user account.

31. The method of claim 26, wherein each resource definition further comprises a schema map.

32. The method of claim 31, wherein said schema map maps a resource attribute to a virtual attribute.

33. The method of claim 31, further comprising creating a composite view of a user based on said schema map from each resource definition.

X. EVIDENCE APPENDIX

No evidence submitted under 37 CFR §§ 1.130, 1.131 or 1.132 or otherwise entered by the Examiner is relied upon in this appeal.

XI. RELATED PROCEEDINGS APPENDIX

There are no related proceedings.